

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS DIVISION

CARLA EDWARDS,

Plaintiff,

v.

COLUMBIA COMMUNITY UNIT  
SCHOOL DISTRICT NO. 4

and

JOHN AND JANE DOE SCHOOL  
DISTRICT EMPLOYEES 1-10,

Defendants.

Case Number: 3:16-CV-1254-NJR-SCW

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AFFIDAVIT OF W [REDACTED] E [REDACTED]

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STATE OF ILLINOIS     )  
                                  ) SS  
COUNTY OF MADISON    )

I, W [REDACTED] E [REDACTED], state as follows:

1. I am competent to make this Affidavit.
2. I am 17 years of age and am making this Affidavit in the presence of my father and legal guardian, Joseph Edwards.
3. This affidavit is made on my personal knowledge.
4. The cell phone identified in *Edwards v. Columbia Community School District No. 4*, Case 3:16-cv-01254-NJR-SCW, as "PLAINTIFF's CELL-PHONE" was a cell phone given to me for my sole use by my mother, Carla Edwards, on or about April, 2015.

5. Since receiving possession of the cell phone from my mother, Carla Edwards, I maintained exclusive possession and control of the cell phone at all times through on or about February, 2016.
6. During the period of time that I was in sole possession of the cell phone, from on or about April, 2015, to on or about February, 2016:
  - a. Carla Edwards did not have access to my cell phone.
  - b. Carla Edwards did not use my cell phone to personally text, call, message, or otherwise electronically communicate.
  - c. Carla Edwards never requested to use my cell phone for her personal communication purposes.
  - d. Carla Edwards did not have an e-mail account that links to my cell phone.
  - e. Carla Edwards did not have any personal accounts downloaded on or linked to my cell phone.
  - f. Carla Edwards did not store any personal data, e-mails, or text messages on my cell phone.
  - g. The cell phone was locked at all times and only accessible by my fingerprint or private passcode.
  - h. Carla Edwards was not able to access my cell phone with her fingerprint.
  - i. Carla Edwards did not have knowledge of the private passcode to access my cell phone.
  - j. Carla Edwards never told me, either verbally or in writing, explicitly or implicitly, that the communication and data on my cell phone were hers or private.
  - k. Carla Edwards never told me that I would need her consent to engage in any particular activity related to my cell phone.
  - l. I regularly shared electronic communications and data from my cell phone with other persons.
  - m. It was solely in my discretion what information from my cell phone that I shared with other persons.

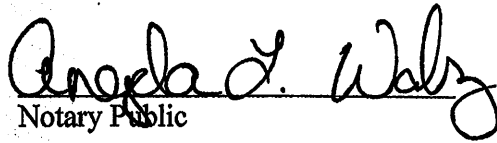
- n. No employee, agent or representative of Columbia Community Unit School District No. 4 forced, coerced or required me to provide them any information, including text messages, from my cell phone.
- o. No employee, agent or representative of Columbia Community Unit School District No. 4 ever took control of my cell phone.
- p. No employee, agent or representative of Columbia Community Unit School District No. 4 ever accessed my cell phone without my permission.
- q. No employee, agent or representative of Columbia Community Unit School District #4 ever searched or seized my cell phone.
- r. No employee, agent or representative of Columbia Community Unit School District #4 downloaded, extracted, or transcribed text messages directly from my cell phone.
- s. At no time did Columbia Community Unit School District #4, its employees, agents or representatives violate my constitutional rights.
- t. I voluntarily shared text messages from my cell phone that I received from my mother with employees of Columbia Community Unit School District No. 4 of my own free will and volition. Exhibit 1.
- u. I received text messages on my cell phone from my mother, Carla Edwards, and I voluntarily and on my own volition shared the text messages with employees of Columbia Community Unit School District No. 4 to show them that my mother, Carla Edwards, was texting me multiple times during the school day and I wanted the texting to stop. Exhibit 1.
- v. I received a voluminous number of text messages on my cell phone from my mother, Carla Edwards, and I voluntarily and on my own volition had my father, Joseph Edwards, download those text messages and provide the text messages to representatives of Columbia Community Unit School District No. 4, because I wanted the school employees to stop my mother from texting me during the school day. Exhibit 2.

Affiant further saith not.

W E

Subscribed and sworn to before me

this 4<sup>th</sup> day of December 2016.

  
Notary Public

